



PEARLAND POLICE DEPARTMENT

TELEPHONE (713) 485-4361 FAX 485-9480 2703 VETERANS DRIVE PEARLAND, TEXAS 77584

P. M. (MIKE) HOGG - CHIEF OF POLICE

May 13, 1993

Federal Communications Commission
1919 M. Street N.W., Room 222
Washington, D. C. 20554

Attn: Donna Searcy, Secretary

Re: P. R. Docket No. 92-235

Dear Ms. Searcy,

This correspondence is forwarded from the Emergency Communications

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Committee of the Pearland Emergency Management Team. This team

Docket No. 92-235

May 14, 1993

Page Two

Presently there are no frequencies available to the City of Pearland in the UHF band and no useable new frequencies are available in the 150 to 175 Mhz band according to our APCO Coordinators. Therefore, the prospect to having access to some new frequencies channels does interest us as we have to operate three (3) and four (4) radios on three (3) bands in some of our supervisory vehicles.

A number of the proposals in P.R. 92-235 raise points of great concern.

VHF AND UHF BAND SPLITTING

The restriction that only new users would be assigned the five (5) Khz. channels. bracketing our percent of assigned frequency

Docket No. 92-235

May 14, 1993

Page Three (3)

INNOVATIVE SHARED USE

This part of the proposal under consideration appears to be a wireline/non-wireline cellular system. Smaller cities in a metropolitan area have a real problem in competing with these frequencies for the operations of city services. This part of the proposal is totally unacceptable to us. It appears that the parties interested in the innovative sharing process are interested in only making a profit on frequencies that are now part of the operating frequencies of the public safety and small government operations in the area. Most of the VHF and UHF RCC and wireline mobile telephone channel pairs go unused at this time because cellular took all of their customers away. These channels are needed in all of the public safety, fire service, and emergency medical service operations.

POWER LIMITATIONS

There is concern that there would not be reasonable building penetration for some operations with a 75 watt base station transmitter and high gain antenna. If these power limitations are as anticipated, this could cause public safety operations to be dysfunctional in certain areas within our city. Penetration of the spectrum to emergency responding personnel can be a life threatening matter. Therefore, any consideration of power limitations must take public safety into account.

LOADING CRITERIA

The loading criteria of the proposal appears on the face to limit the availability of channels for tactical/surveillance channels for our criminal investigations personnel. These tactical channels are necessary to operate privately out of the normal spectrum of the public safety communications network. Any limitation in this area would limit law enforcement capabilities severely and would be opposed by our group.

TRUNKING SYSTEMS

Present day trunking systems are very expensive and those with the data controller channel are not as spectrum efficient as some of other systems. These systems have good points however, the cost make the systems out of the small and medium size city budgets. The cost of system replacement must be taken into account when considering any change in systems and the effect on local operations.

Docket No. 92-235
May 14, 1993
Page Four (4)

COST OF SYSTEM REPLACEMENT

The overall replacement of five (5) systems (which would be required in Pearland), three (3) VHF high-band repeaters systems, and two (2) UHF repeaters systems plus several single channel systems that are now in place will cost the City of Pearland in the neighborhood of \$300,000.00 in 1993 dollars. It becomes immediately clear that the cost of such system would require long term planning on the part of any governmental agency before such a move could take place. It is hoped that any decisions made would allow for this planning process and the identification of dollars necessary for any changes that take place.

CONCLUSION

In summary, we do not want to appear totally negative on the ideas of refarming and restructuring our current system. There are a number of issues which must be taken into account. We understand that there is a limited number of airways available and that there must be some refarming in order to meet all of the needs of the user public in our country.